

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN)
-----------------------------------------------	-------------------------

This document relates to:

Ashton et al. v. al Qaeda et al., 02-cv-6977 (GBD) (SN)

CERTIFICATE OF SERVICE OF JUDGMENT

I, Megan W. Benett, Esq., declare under penalty of perjury, as provided for by 28 U.S.C. § 1746, that the following statements are true and correct:

I certify that I caused a judgment to be served on the Islamic Republic of Iran ("Iran") on February 18, 2020, by delivery to the Clerk of the U.S. District Court for the Southern District of New York, pursuant to the Foreign Sovereign Immunities Act, of such judgment, a notice of judgment, and other documents set forth in the transmittal letter, a copy of which is annexed hereto, for submission to the U.S. Department of State, along with the requisite service fee, for delivery to the Foreign Minister of Iran via diplomatic means.

Dated: February 18, 2020

Name (Signature): 

Name (Print): Megan W. Benett, Esq.



KREINDLER & KREINDLER LLP | 750 Third Avenue | New York, NY 10017-2725

office: 212.687.8181 | fax: 212.972.9432 | www.kreindler.com

February 18, 2020

VIA HAND DELIVERY

Ms. Ruby J. Krajick
Clerk of the Court
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)
Ashton et al. v. al Qaeda et al., 02-cv-6977 (GBD) (SN)

Dear Ms. Krajick,

Please be advised that this firm represents certain plaintiffs in the above referenced actions, for whom final judgments have been obtained against the Islamic Republic of Iran. Copies of the final judgments are enclosed, together with related litigation documents. We request that you assist these plaintiffs in effecting service of the enclosed judgments upon the Islamic Republic of Iran pursuant to the Foreign Sovereign Immunities Act ("FSIA"), 28 U.S.C. §1608(a)(4).

Plaintiffs have complied with the requirements for service, in that the Islamic Republic of Iran is a foreign state as defined in 28 U.S.C. §1603 of the FSIA and we have previously attempted to serve Iran with the initiating Summons and Complaint through traditional means of service pursuant to 28 U.S.C. §1608(a)(1)-(3) but were unsuccessful. Therefore, we request that you assist us in serving the enclosed final judgments through diplomatic channels by dispatching the enclosed documents to the Secretary of State, attention Director of Special Consular Services, so that the State Department may perfect service under 28 U.S.C. §1608(a)(4) upon:

Islamic Republic of Iran
H.E. Dr. Mohammad Javad Zarif
Foreign Minister of the Ministry of Foreign Affairs
Imam Khomeini Street, Imam Khomeini Square
Tehran, Islamic Republic of Iran

Enclosed you will find a cover letter directed to the Director of Special Consular Services, as well as two full sets of the following:

February 18, 2020

Page 2

- (1) the Notice of Default Judgment and its certified Farsi translation, which conforms to the requirements of 22 C.F.R. 93.2 ("Notice");
- (2) a true and certified copy of the August 31, 2015 Default Judgment on Liability and the certified Farsi translation thereof. See Attachment A to the Notice;
- (3) a true and certified copy of the February 12, 2020 Final Order of Judgment, the moving papers for Plaintiffs' Motion, and the certified Farsi translations of the Default Judgment and Plaintiffs' motion papers. See Attachment B to the Notice; and
- (4) a copy of the Foreign Sovereign Immunities Act and the certified Farsi translation. See Attachment C to the Notice.

These documents are to be transmitted to the Secretary of State in the enclosed, pre-paid Federal Express envelope, together with the enclosed cashier's check in the amount of \$2,275.00 made payable to "U.S. Embassy Bern," and a pre-paid return envelope.

Finally, we have enclosed one additional copy of each of these documents for the Court's file.

Your assistance in expediting this request is greatly appreciated. If you should have any questions or need additional information, I can be reached at (914) 220-5333.

Thank you and best regards.

Very truly yours,

KREINDLER & KREINDLER, LLP



By: Megan W. Benett, Esq.

Enclosures
Ashton XVII/Betru VI